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May 17, 2023

Via ECF

The Honorable Margo K. Brodie
Chief United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Third-Party Petitioner, Kimora Lee Simmons-Leissner's Petition,
United States v. Tim Leissner, 18 Cr. 439 (MKB)

Dear Chief Judge Brodie,

We respectfully submit this letter on behalf of our client Kimora Lee Simmons-Leissner in connection with the Court's amended preliminary order of forfeiture entered on March 3, 2023 (Dkt. No. 68). Enclosed is a Notice of Motion to Admit Counsel Pro Hac Vice for Michael D. Roth pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts along with the applicable documentation.

We appreciate the Court's attention to this matter.

Very truly yours,



David K. Willingham
(*pro hac vice* application, forthcoming)
Michael D. Roth
(*pro hac vice* application, forthcoming)
David Lesser
*Attorneys for Third-Party Petitioner,
Kimora Lee Simmons-Leissner*

MDR:slr

Enclosures